

Avram E. Frisch, Esq.  
The Law Office of Avram E.  
Frisch LLC  
1 University Plaza, Suite 119  
Hackensack, NJ 07601  
201-289-5352  
frischa@avifrischlaw.com  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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**DEVI RAJSHRI SETHUMADHAVA MENON**

Docket No. 2:21-cv-08384

Plaintiff,

- against -

**CERTIFICATION OF AVRAM E.  
FRISCH IN SUPPORT OF THE  
MOTION**

**WARD CORBETT AND CATALYST  
PARTNERS MANAGEMENT LLC**

Defendant.

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Pursuant to 28 U.S.C. § 1746, I, Avram E. Frisch, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the attorney for the Plaintiff in this action and make this certification in support of the application of Plaintiff for default judgment.
2. Annexed hereto as **Exhibit A** is a ledger from my prior billing system maintained in the ordinary course of business reflecting the attorney's fees and disbursements that were caused by the Defendants' willful evasion of service in this matter through August 1, 2024.

3. Annexed hereto as **Exhibit B** is a ledger from my current billing system maintained in the ordinary course of business reflecting the attorney's fees from August 1, 2024- March 4, 2025, along with the total case balance.
4. As reflected therein, Plaintiff has expended costs in the amount of \$1,174 and legal fees in the \$8,695.00.
5. As set forth in the Declaration I filed on September 15, 2023 (ECF #18), the Defendants were properly served in accordance with the Court's order (ECF #17). As such, default judgment is appropriate in this matter.
6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 5, 2025.

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/s/ Avram E. Frisch  
Avram E. Frisch